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Subject: Data Certification Q and A on Contract Labs for PM
Date: Thursday, March 14, 2013 10:33:00 AM

FYI

Hi Meredith,

Our conversation with Imperial yesterday inspired me to take a look at the certification Q and A from CY2011. Turns out there is some language about contract labs (RTI is used as the example) and who should certify the data. I thought this might help the discussion with agencies who operate the monitors, but do not do the analysis.

Seems like our position in the past has been the monitoring agency who operates the monitors must certify (per "monitoring regulations") the data regardless of where the analysis is performed.

See language below (bold/underlined):

14. What about data with split responsibilities, such as for some PM_{2.5} speciation monitoring in which an EPA contractor does the laboratory work and gives the monitoring agency a period to review and make changes before the contractor enters the data into AQS?

Most monitoring agencies send PM_{2.5} speciation filters to Research Triangle Institute (RTI) under an EPA-managed contract. OAQPS is aware that some monitoring organizations have in the past chosen not to certify data from PM_{2.5} speciation monitors for which chemical analysis is performed by RTI because RTI is not under direct contract and supervision by the monitoring organizations. **However, the monitoring regulations require the senior air pollution control officer of state or local agency which operates a monitor (i.e., the agency which manages the monitoring station, changes filters, and does flow checks and maintenance on the monitor) to certify all the data from that monitor, with no exception based on where chemical analyses were performed.** This certification must indicate that the ambient data are accurate to the best of his or her knowledge. The certifying official may add additional explicit text if he or she wishes to document what parts of the field versus laboratory operations were performed by his or her agency. OAQPS encourages every monitoring agency using the RTI laboratory service to actively review data provided by RTI prior to it being uploaded into AQS. More information on the data validation process for the RTI laboratory analysis is available at <http://www.epa.gov/ttn/amtic/files/ambient/pm25/spec/05datval.pdf>.

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